

McElroy Deutsch

1300 Mount Kemble Avenue
P.O. Box 2075
Morristown, NJ 07962-2075
T: 973.993.8100 | F: 973.425.0161
MDMC-LAW.COM

LAURENCE MCHEFFEY, ESQ.
TEL. NO.: (973) 425-8965
LMCHEFFEY@MDMC-LAW.COM

LYDIA K. DEUTSCH, ESQ.
TEL. NO.: (201) 424-5264
LDEUTSCH@MDMC-LAW.COM

May 9, 2023

VIA ECF

The Honorable Cathy L. Waldor
Martin Luther King Jr. Courthouse
50 Walnut Street, Room 4040, Courtroom 4C
Newark, NJ 07101

RE: Sun Chemical Corporation v. American International Group, Inc., et al.
Docket No.: 2:20-cv-6252-SRC-CLW
MDMC File No.: A0014-1743

Dear Judge Waldor:

This firm represents Defendants American Home Assurance Company and National Union Fire Insurance Company of Pittsburgh, PA, in its own right and as successor-in-interest to Landmark Insurance Company, (“Defendants”), in the above-captioned matter filed by Sun Chemical Corporation (“Plaintiff”).

The parties respectfully request the Court grant an adjournment of the date by which the parties may respond to supplemental discovery requests from May 3, 2023 to June 9, 2023, and request an additional adjournment to July 14, 2023. Defendants observed upon the exchange of the discovery demands, discussion during a recent meet and confer, and recent correspondence that it may be beneficial to extend this upcoming deadline set forth in Paragraph No. 6 of the Fifth Amended Pretrial Scheduling Order, as amended by Text Order, dated February 28, 2023. As such, Defendants sought and received Plaintiff’s consent to submit this request seeking leave to adjourn this date as set forth above.

Thank you.

Respectfully submitted,

MCELROY, DEUTSCH, MULVANEY & CARPENTER, LLP

/s/ Laurence McHeffey

Laurence McHeffey, Esq.
Lydia K. Deutsch, Esq.

cc: All Counsel of Record (via ECF Notification)

SO ORDERED: _____
Hon. Cathy L. Waldor, U.S.M.J.